

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ELAINE KERN,)
)
Plaintiff,)
)
v.) No. 20-cv-01404
)
DZAVAD KRSO and) Hon. Marvin E. Aspen
BLUESTAR SERVICES LLC,)
)
Defendants.)

AFFIDAVIT OF MICHAEL J. SORICH

NOW COMES Michael J. Sorich, affiant, and hereby states upon penalty of perjury that if called upon to testify, he will competently state as follows:

1. My name is Michael J. Sorich; I am over the age of 18; and I am an attorney employed by Cavanagh Law Group.
2. Cavanagh Law Group was retained to represent the Plaintiff in this matter, Elaine Kern.
3. I received Defendants, Dzavad Krso and Bluestar Services, LLC's Notice of Removal and was asked to investigate the propriety of removal in this case and, if I determined that Plaintiff had a good-faith basis to move for remand, to prepare a Motion to Remand and present said motion to this Honorable Court.
4. From February 27, 2020 until March 9, 2020, I read Defendant's Notice of Remand and performed legal research to assess whether Plaintiff had a good faith basis to move for remand. My research included assessing the Federal Rules of Civil Procedure, 28 C.F.R. §1332, 28 C.F.R. §1441, 28 C.F.R. §1446, assessing case law by the Supreme Court of the United States and the Seventh Circuit Court of Appeals and reading District Court rulings from the Northern District of



Illinois, Eastern Division. In addition, I performed searches with the Illinois Secretary of State. Upon completion of this research, I determined that Plaintiff had a good faith basis to move for remand. I believe that I spent 2 hours performing the above tasks, in preparation for drafting Plaintiff's Motion for Remand.

5. After completing my research, I drafted Plaintiff's Motion for Remand. This is an eight-page motion which cites statutory authority and case law. I believe that I spent 2.5 hours drafting and editing said motion.

6. I am a Partner at Cavanagh Law Group in my seventeenth (17th) year of legal practice. I calculate that I spent 4.5 hours preparing for and drafting Plaintiff's Motion to Remand. I propose an attorney's fee of \$600.00 per hour, which I believe is appropriate for an attorney of my experience in the Chicago area. Based on 4.5 hours of preparation and drafting, and given an hourly fee of \$600.00, I request attorney's fees in the amount of \$2,700.00 for the drafting of this motion.

FURTHER AFFIANT SAYETH NAUGHT

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



Michael J. Sorich